

REMARKS

Claims 1-7, 14, 15, 17, 19-27, and 31 are amended. Claims 8-13, 16, 18, 28-30, and 32 are cancelled. New dependent claims 33-36 are added. Upon entry of this amendment, claims 1-7, 14, 15, 17, 19-27, 31, and 33-36 will be pending.

Tina Lessani (Applicant's attorney) and Mark Schoenhals (inventor) had an Interview with the Examiner on September 18, 2007. Applicant and Applicant's attorney thank the Examiner for the Interview. Claims 1-7, 14, 15, 17, 19-27, 31, and 33-36 were discussed in the Interview. The amendments set forth in this Amendment and Response were presented during the Interview. The reasons for allowance set forth in this Amendment and Response were presented during the Interview. In the Interview, the Examiner agreed that the amended claims were patentably distinguishable over the art cited in the March 27, 2007 Office Action.

The Examiner rejected claim 6 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards at the invention. The Examiner states that "use of 'if' renders the claim indefinite since it is not clear what occurs if information relating to how the user reached the website is not available." Although Applicant does not agree with the rejection, Applicant amended claim 6 to delete "if information related to how the user reached the first network service is available" and to instead recite "in response to the user clicking on an online advertisement to reach the website." Applicant respectfully submits amended claim 6 meets the requirements of 35 U.S.C. 112, second paragraph.

The Examiner rejected claims 1-14 and 19-26 as being anticipated by Blair et al ("Blair"). This rejection is moot with respect to claims 8-13 as these claims have been

cancelled. Applicant respectfully traverses this rejection with respect to amended claims 1-7, 14, and 19-26.

Independent claims 1 and 19 recite: “for each user that accesses the website, transmitting a webpage to the user that visibly displays a unique ID, where the unique ID is unique to the user’s web browser, and the where the unique ID is generated without obtaining information that identifies the user personally.” Similarly, independent claim 23 recites: “a web server for the website that transmits a web page that visibly displays a unique ID to each user that accesses the website, where, for each user, the unique ID is unique to the user’s web browser, and unique ID is generated without obtaining information that identifies the user personally.” Use of such unique ID enables a user’s call to a customer service agent to be correlated with a user’s prior browsing of a website. The method of the claimed invention does not require the user to register, purchase a product, or provide any personally identifying information in order to receive a unique ID. This is an important advantage because the present invention can correlate a user’s use of website with a subsequent phone call without requiring the user to register or provide personal information on the website. In the method of the present invention, the phone call to the customer service agent is made “independent of the website” in that the user does not submit a request to speak with a customer service represent through the website.

Blair does not disclose a system or method for correlating a user’s phone call with a user’s use of a website. Instead, Blair discloses a method for accepting payments from a consumer for travel tickets from a travel company. In Blair, the user makes a travel reservation via phone, web, or the like. Once the reservation is made, the customer is

given a transaction identifier. The customer then provides the transaction identifier to a payment provider, where the transaction identifier is used to correlate the customer's payment with the reservation made by the customer.

Unlike the present invention, Blair fails to disclose a correlation method that does not require the user to provide personal information. Blair requires the user to provide personal information (*i.e.*, the user must make a travel reservation) to receive a transaction identifier.

In view of the above, Applicant respectfully submits that claims 1-7, 14, and 19-27 are patentably distinguishable over Blair.

The Examiner rejected claims 15-18 under 35 U.S.C. 103(a) as being unpatentable over Blair in view of McElfresh et al. ("McElfresh"). This rejection is moot with respect to claims 16 and 18, as these claims are cancelled. Applicant respectfully traverses this rejection with respect to amended claims 15 and 17.

Claims 15 and 17 are patentably distinguishable over Blair for the reasons described above with respect to claims 1-7 and 19-26. The Examiner recites McElfresh as teaching "determining whether a unique ID associated with the first network service has been previously assigned to the user; if a unique ID has been previously assigned to the user, retrieving the unique ID and transmitting the unique ID to the user, and if a unique ID has not been previously been assigned to the user, generating a unique ID for the user, storing the unique ID, and transmitting the unique ID."

McElfresh teaches passing a user identification tag to a user in a cookie or as appended to a URL. However, unlike the present invention, McElfresh does not teach visibly displaying a unique ID to the user for the purchase of correlating two systems.

The user identification tag described in McElfresh is not visible to the user. Rather, it is hidden in a cookie (column 4, lines 27-30) or URL (column 9, rows 22-22) and used to determine effective ad placement locations for the user. Therefore, Applicant respectfully submits that claims 15 and 17 are patentably distinguishable over the combination of Blair and McElfresh.

The Examiner did not address claims 27 and 31 in the Office Action, but Applicant respectfully submits that claims 27 and 31 are patentably distinguishable over Blair and McElfresh for the same reasons described above.

New claims 33-34 are dependent on claim 1, and new claims 35-36 are dependent on claim 19. Such new claims are patentably distinguishable over Blair and McElfresh for the reasons described above.

Applicant respectfully submits that claims 1-7, 14, 15, 17, 19-27, 31 and 33-36 are patentably distinguishable over the art made of record and not relied upon.

Applicant respectfully requests allowance of the application.

Respectfully submitted,

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